

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

ROCCO CIOFOLETTI, et al., on behalf
of themselves and all others similarly
situated,

Plaintiffs,

-vs-

SECURIAN FINANCIAL GROUP, INC.,
et al.,

Defendants.

Case No.: 0:18-cv-03025-JNE-ECW

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs, by and through counsel, hereby move this Court for an order certifying this action as a class action pursuant to Rule 23(a) and (b)(3); appointing all Plaintiffs' attorneys as Class Counsel; and appointing Plaintiffs as Class Representatives.

This Motion is based on the pleadings, files, records, and testimony herein, including Plaintiffs' Memorandum of Law and the Declaration of Lee Squitieri filed in support of this Motion.

Dated: March 31, 2021

s/Daniel J. Nordin

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